

PANAKOS LAW, APC
Aaron D. Sadock (SBN 282131)
555 West Beech Street, Ste. 500
San Diego, California 92101
Telephone: (619) 800-0529
Facsimile: (866) 365-4856

LAW OFFICES OF DANIEL A. KAPLAN
Daniel A. Kaplan (SBN 179517)
Alexandra R. Byler (SBN 294307)
555 West Beech Street, Suite 230
San Diego, California 92101
Telephone: (619) 685-3988
Facsimile: (619) 684-3239

Attorneys for Defendants

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego
11/19/2018 at 08:00:00 AM
Clerk of the Superior Court
By Jessica Pascual, Deputy Clerk

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN DIEGO – CENTRAL DIVISION

JANE DOE NOS. 1-14, inclusive,
individuals;

Plaintiffs,

v.

GIRLSDOPORN.COM, a business
organization, form unknown; MICHAEL J.
PRATT, an individual; ANDRE GARCIA,
an individual; MATTHEW WOLFE, an
individual; BLL MEDIA, INC., a California
corporation; BLL MEDIA HOLDINGS,
LLC, a Nevada limited liability company;
DOMI PUBLICATIONS, LLC, a Nevada
limited liability company; EG
PUBLICATIONS, INC., a California
corporation; MIM MEDIA, LLC, a
California limited liability company;
BUBBLEGUM FILMS, INC., a business
organization, form unknown; OH WELL
MEDIA LIMITED, a business organization,
form unknown; MERRO MEDIA, INC., a
California corporation; MERRO MEDIA
HOLDINGS, LLC, a Nevada limited liability
company; and ROES 1 - 500, inclusive,

Defendants.

LEAD CASE:
Case No. 37-2016-00019027-CU-FR-CTL

CONSOLIDATED WITH:
Case No. 37-2017-00043712-CU-FR-CTL
Case No. 37-2017-00033321-CU-FR-CTL

**DECLARATION OF ANDRE GARCIA
IN SUPPORT OF DEFENDANTS'
MOTION FOR SUMMARY
ADJUDICATION**

Date: February 1, 2019
Time: 9:00 a.m.
Judge: Hon. Joel R. Wohlfeil
Dept.: C-73

Complaint Filed: June 2, 2016
Trial Date: March 8, 2019

[IMAGED FILE]

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1 I, Andre Garcia, declare:

2 1. I am over eighteen years of age. I am a defendant in this case. I have personal knowledge
3 of the facts stated in this declaration and, if called as a witness, could testify competently about
4 them.

5 2. I have been an employee of defendant BLL Media, Inc. since May 2015. I am paid a set
6 salary for the work I perform.

7 3. I have never operated, owned, controlled, or posted on any pornography websites on
8 which Plaintiffs allege their videos were published.

9 4. I have never distributed the videos referenced in Plaintiffs' operative complaints.

10 5. I have never used any of the videos referenced in Plaintiffs' operative complaints for my
11 own personal commercial benefit.

12 6. I have never received any monies or commercial benefit from any of the videos
13 referenced in Plaintiffs' operative complaints, other than getting paid a set hourly wage for work
14 performed.

15 7. I have never entered into a contract with any of the Plaintiffs.

16 8. I maintain my own separate bank account. I do not share bank accounts with any of the
17 named defendants. My personal income is deposited into my bank account. No other defendant
18 deposits monies into my bank account to shield its income.

19 9. I have never held myself out as being liable for the debts of any of the other defendants.

20 10. I have never had an ownership interest in any of the named entity defendants. I have
21 never been an officer, director, member, or manager, of any named entity defendant. The only
22 named entity defendant that has ever employed me is BLL Media, Inc.

23
24 I declare under penalty of perjury under the laws of the State of California that the information
25 contained in this declaration is true and correct to the best of my knowledge.

26 Executed this 16th day of November, 2018 at San Diego, California.

27 /s/ Andre Garcia
28 Andre Garcia